

Mark B. Hanson
Attorney at Law
PMB 738, P.O. Box 10,000
Saipan, Mariana Islands 96950
Telephone: (670) 233-8600
Facsimile: (670) 233-5262
mark@saipanlaw.com

Li Ying Hua, Li Zheng Zhe & Xu Jing Ji
Saipan MP 96950

August 17, 2006

In Reference To: Li Ying Hua et al. v. Jung Jin Corp., et al.

Attorney Fees:

	<u>Hrs/Rate</u>	<u>Amount</u>
5/20/2005 MBH Meeting with clients to discuss facts of case.	2.20 200.00/hr	440.00
6/13/2005 MBH Additional meeting with clients to discuss representation and facts of case.	2.50 200.00/hr	500.00
6/20/2005 MBH Prepare draft fee agreement and draft complaint.	4.30 200.00/hr	860.00
6/21/2005 MBH Meeting with clients to review draft fee agreement and discuss additional facts of case.	2.60 200.00/hr	520.00
6/22/2005 MBH Prepare amendments to FLSA complaint and finalize with clients; prepare and amend summons.	2.30 200.00/hr	460.00
7/13/2005 MBH E-mail to and from Steve Nutting regarding answer and beginning settlement negotiations (.2); review defendants' answer and case management conference statement (.5).	0.70 200.00/hr	140.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
7/18/2005	MBH Work on initial disclosures and case management conference statement.	1.50 200.00/hr	300.00
7/25/2005	MBH Meeting with clients to discuss (A) temporary work authorization, (B) proposed settlement demand and (C) identification of witnesses necessary for initial disclosures.	0.80 200.00/hr	160.00
8/5/2005	MBH Review and calendar case management conference order (.2); call with Nutting regarding settlement (.2).	0.40 200.00/hr	80.00
8/8/2005	MBH Review, modify and finalize CMC statement and initial disclosures (.7); prepare calculations of damages for the three clients (3.2).	3.90 200.00/hr	780.00
8/25/2005	MBH Discussion with Steve Nutting regarding upcoming Case Management Conference and settlement possibilities.	0.20 200.00/hr	40.00
8/26/2005	MBH Attend Case Management Conference; discussion with Steve Nutting regarding settlement.	0.50 200.00/hr	100.00
8/30/2005	MBH Begin review of documents received from Nutting; meeting with clients to discuss some of the documents, settlement offer and assets of their employers.	1.80 200.00/hr	360.00
9/6/2005	MBH Preliminary investigation of three poker establishments, a laundry and the house lot of defendants.	1.20 200.00/hr	240.00
9/7/2005	MBH Call with Steve Nutting regarding documents received, settlement offer and known assets of defendants (.2); work on draft of subpoena to Revenue and Tax regarding poker licenses (.5).	0.70 200.00/hr	140.00
9/8/2005	MBH Finish poker license subpoena.	0.50 200.00/hr	100.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
9/9/2005	MBH Review attachment to subpoena for poker license documents; discussion with staff regarding copying, filing and serving.	0.30 200.00/hr	60.00
9/28/2005	MBH Review title documents and court documents obtained based on grantor/grantee searches and instructions to staff regarding obtaining additional documents (.9); meeting with Dennis to discuss status of case (.2).	1.10 200.00/hr	220.00
10/4/2005	MBH Review documents provided by Revenue and Tax pursuant to subpoena regarding poker licenses and prepare table of same (1.5); review additional file documentation; draft letter to Nutting regarding final disclosures and settlement offer (.7).	2.20 200.00/hr	440.00
10/18/2005	MBH Review settlement letter from Steve Nutting.	0.20 200.00/hr	40.00
12/12/2005	MBH Discussion with Steve Nutting regarding discovery document production and defendants' plan to file for bankruptcy protection (.2); call from Dennis Tse regarding ad in paper for sale of Jung Jin assets; e-mail to Nutting regarding same (.3).	0.50 200.00/hr	100.00
12/15/2005	RDV Pick-up discovery documents from Nutting's Office and drop it off at Pacific Quick Print for copying.	0.50 45.00/hr	22.50
12/16/2005	RDV Bates stamping of discovery documents.	3.50 45.00/hr	157.50
	RDV Drop borrowed files to Nutting's Office.	0.20 45.00/hr	9.00
12/19/2005	MBH Meeting with clients to discuss status of case and recent actions by defendants to sell their assets.	1.00 200.00/hr	200.00

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	<u>Hrs/Rate</u>	<u>Amount</u>
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12/22/2005 MBH	Draft letter to Steve Nutting regarding defendants' advertisement to sell all their assets; notes regarding advertisement.	0.30 200.00/hr	60.00
1/3/2006 MBH	Call from translator regarding clients information that laundry sold for \$200K; draft e-mail to Steve Nutting regarding same and scheduling depositions (.2); preliminary review of defendants' responses to interrogatories (.5).	0.70 200.00/hr	140.00
1/4/2006 MBH	Call from translator regarding additional transfers by defendants of their assets; e-mail to Steve Nutting regarding same; additional research regarding fraudulent transfers.	1.20 200.00/hr	240.00
1/6/2006 MBH	E-mail to and from Steve Nutting regarding discovery issues, including scheduling of depositions.	0.40 200.00/hr	80.00
1/9/2006 MBH	Discussion with Dennis Tse regarding communications with clients about further information on asset transfers of Defendants (.2); review e-mail from Steve Nutting; draft notices of deposition (1.0).	1.20 200.00/hr	240.00
1/11/2006 MBH	E-mail to Steve Nutting regarding deposition dates and communications with his clients.	0.10 200.00/hr	20.00
1/13/2006 MBH	Call with Steve Nutting regarding deposition scheduling, some discovery issues and possibility of additional settlement negotiations (.2); prepare subpoenas to business licensing and to BMV; call to BMV regarding name of director (.8)	1.00 200.00/hr	200.00
1/18/2006 MBH	Discussions with staff regarding translator for upcoming deposition; e-mail to Steve Nutting regarding same and additional discovery issues.	0.20 200.00/hr	40.00
1/19/2006 MBH	Calls with BMV regarding responses to subpoena; review correspondence from Nutting regarding discovery due; meeting with Joe Taijeron to review BMV response to	0.50 200.00/hr	100.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	subpoena.		
1/20/2006 MBH	Calls to and from Steve Nutting regarding discovery and settlement possibilities; calls with Dennis Tse regarding same; briefly review bank records received in discovery.	0.50 200.00/hr	100.00
1/21/2006 MBH	Meeting with clients regarding settlement (1.2); calls to and from Steve Nutting regarding settlement (.2).	1.40 200.00/hr	280.00
1/23/2006 MBH	Review discovery documents and begin preparing for deposition of Jung Jin.	4.20 200.00/hr	840.00
1/24/2006 MBH	Continue deposition preparation and meeting with clients regarding same (2.6); first part of deposition of Jung Jin (.2); first part of deposition of Asia Enterprises (3.0).	5.80 200.00/hr	1,160.00
1/25/2006 MBH	Additional deposition preparation (.6); continue deposition of Asia Enterprises with Mr. Kim (1.7); complete deposition of Asia and dump audio to computer (1.8); meeting with Joe Taijeron regarding additional response to subpoena (.2).	4.30 200.00/hr	860.00
1/26/2006 MBH	Discussion with Steve Nutting regarding lingering discovery issues and possible settlement.	0.20 200.00/hr	40.00
1/30/2006 MBH	Discussion with Steve Nutting regarding depositions and continuing discovery; draft notices of depositions of Kim Pil Sun and Kim Sung Ki; draft subpoenas and attachments for same; draft letter to Nutting regarding additional discovery documents.	2.90 200.00/hr	580.00
1/31/2006 MBH	Several discussions with staff regarding service of subpoenas for Kim Sung Ki and Kim Pil Sun.	0.30 200.00/hr	60.00
2/1/2006 MBH	Call to Steve Nutting office (.1); call to Registrar of Corporations regarding KSK Corporation and review annual report received therefrom (.2); draft subpoenas with attachment for Kim Sung Eun and Cindy Yu (.6);	1.10 200.00/hr	220.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	discussions to staff and process server regarding witness and mileage fees and service (.2)		
2/3/2006 MBH	Review Nutting motion to withdraw and calendar.	0.20 200.00/hr	40.00
2/6/2006 MBH	Review letter from Richard Pierce objecting to subpoena to Kitami; research Rule 45 and issue raised by letter; draft letter in response.	2.30 200.00/hr	460.00
2/7/2006 MBH	Review and respond to Pierce letter regarding Kim Pil Sun subpoena.	1.00 200.00/hr	200.00
2/14/2006 MBH	Call with Richard Pierce regarding Kim Pil Sun deposition scheduling and other subpoena issues.	0.20 200.00/hr	40.00
2/15/2006 MBH	Review letter from Dick Pierce and documents attached regarding Kim Pil Sun deposition (.2); call with Steve Nutting regarding same and prepare amended notice of deposition (.2); prepare stipulation to continue status/settlement conference (.3).	0.70 200.00/hr	140.00
2/16/2006 MBH	Call with translator Alex Tae regarding scheduling of deposition; calls with Dick Pierce regarding same; calls with Steve Nutting office regarding same (.3); draft letter to Pierce regarding subpoena responses (.5); prepare additional subpoena for documents from Kim Pil Sun Kitami (.2); prepare amended notice of deposition (.1).	1.10 200.00/hr	220.00
2/17/2006 MBH	Revise letter to Pierce; discussions with staff regarding preparation and service of documents.	0.20 200.00/hr	40.00
2/21/2006 MBH	Deposition of Kim Pil Sun Kitami (2.1); review and respond to letter from Dick Pierce regarding second subpoena for documents (.4).	2.50 200.00/hr	500.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/2/2006	MBH Meeting with clients to discuss settlement for upcoming conference (.5); work on revised and updated calculations of damages for three clients (1.2).	1.70 200.00/hr	340.00
3/3/2006	MBH Attend status conference.	0.60 200.00/hr	120.00
3/6/2006	MBH Discussion with staff regarding translator for upcoming depositions (.1); call from assistant of Kim Sung Ki regarding document production and upcoming deposition (.2).	0.30 200.00/hr	60.00
3/7/2006	MBH Prepare for deposition of Kim Sung Ki (.5); deposition of Kim Sung Ki (1.0).	1.50 200.00/hr	300.00
3/9/2006	MBH Prepare for deposition (.8); deposition of Kim Ki Sung including post-deposition management (3.5).	4.30 200.00/hr	860.00
3/13/2006	MBH Research regarding FLSA successor liability and alter ego; begin drafting motion to amend.	5.10 200.00/hr	1,020.00
3/14/2006	MBH Continue research and drafting of motion to amend; discussions with staff regarding ordering transcripts from depositions.	2.20 200.00/hr	440.00
3/21/2006	MBH Discussion with translator regarding meeting about declarations (.2); brief research regarding joint liability issues (.3).	0.50 200.00/hr	100.00
3/24/2006	MBH Deposition of Cindy Yu including deposition preparation (2.0); meeting with clients to discuss facts for declarations and status of case (.5); work on completing transcripts (1.2).	3.70 200.00/hr	740.00
3/28/2006	MBH Work on declarations of plaintiffs including meetings to review, revise and execute the same; review and revise calculations of damages.	6.70 200.00/hr	1,340.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/29/2006	MBH Work on completion of transcripts.	4.20 200.00/hr	840.00
3/30/2006	MBH Work on transcript review and completion.	3.90 200.00/hr	780.00
3/31/2006	MBH Finish review and completion of transcripts for Jung Jin, Asia, Kim Ki Sung and Kitami depos (1.2); work on proposed findings of uncontroverted fact (4.1).	5.30 200.00/hr	1,060.00
4/5/2006	SJR Meeting with Mark Hanson to discuss needed work on Motions to amend for default and for summary judgment.	1.20 150.00/hr	180.00
	MBH Review and certify Cindy Yu deposition (.5); finish declaration of counsel (.5); meeting with associate to discuss completing motions (1.2); additional notes to associate and e-mail regarding regulations (.3).	2.50 200.00/hr	500.00
4/6/2006	SJR Review deposition testimony and court documents.	2.50 150.00/hr	375.00
4/7/2006	SJR Research applicable law regarding Corporations represented by counsel and penalties for not having counsel.	1.00 150.00/hr	150.00
4/8/2006	SJR Work on draft of motion to dismiss for failure to have counsel.	0.80 150.00/hr	120.00
4/9/2006	SJR Research successor liability and amending pleadings.	0.70 150.00/hr	105.00
4/10/2006	SJR Work on draft of motion to amend pleadings.	1.20 150.00/hr	180.00
	SJR Review deposition testimony for motion to amend pleadings.	1.00 150.00/hr	150.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
4/14/2006	MBH Call with associate regarding briefs.	0.60 200.00/hr	120.00
	SJR Telephone conference with Mark Hanson regarding changes to draft motions.	0.60 150.00/hr	90.00
4/15/2006	SJR Review e-mail message from Mark Hanson regarding changes to draft motions.	0.20 150.00/hr	30.00
	MBH Review and revise draft motion for default judgment; e-mail to associate regarding same.	2.30 200.00/hr	460.00
4/16/2006	SJR Revise motion to dismiss and to amend pleadings.	2.00 150.00/hr	300.00
4/19/2006	MBH Calls with staff regarding preparation of documents for filing (.2); preliminary review of most recent drafts of motion for sanctions and motion to amend (.5); calls with associate regarding same and changes (.3).	1.00 200.00/hr	200.00
	SJR E-mail to Mark Hanson regarding additional changes to draft motions (.2) ; telephone conference with Mark Hanson regarding same (.3).	0.50 150.00/hr	75.00
4/20/2006	SJR Review documents for filing and delivery to Mark Hanson's Office.	0.50 150.00/hr	75.00
	MBH Review changes and additional editing of motion for sanctions brief (.9); review changes and additional editing of motion to amend brief (1.5).	2.40 200.00/hr	480.00
5/12/2006	MBH Attend settlement/status conference (.5); draft motion and proposed order regarding extension of Case Management deadlines; review and revise (.5); review orders from court and discussion with staff regarding preparation, review and filing of an amended complaint (.2); call with translator regarding meeting for clients	1.40 200.00/hr	280.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	regarding same (.2).		
5/16/2006	MBH Work on amended complaint.	0.50 200.00/hr	100.00
5/17/2006	MBH Additional review and revision of Amended complaint.	1.50 200.00/hr	300.00
5/22/2006	MBH Review opposition filing of Kim Ki Sung to motion to amend; call to Robert Torres regarding same; meeting with Mr. Kim Hang Kwon regarding settlement.	1.20 200.00/hr	240.00
5/23/2006	MBH Review and calendar order from Court setting hearing and briefing schedule regarding KSK motion.	0.20 200.00/hr	40.00
6/6/2006	MBH Work on draft of opposition to motion to strike or to dismiss.	0.90 200.00/hr	180.00
	MBH Attend status conference regarding scheduling matters.	0.70 200.00/hr	140.00
6/7/2006	MBH Continue drafting opposition to motion to strike or to dismiss filed by KSK.	2.10 200.00/hr	420.00
6/8/2006	MBH Additional research regarding issues in defendants' motion to dismiss; complete, review, revise, and edit opposition brief; draft declaration; instructions to staff regarding filing and service.	5.20 200.00/hr	1,040.00
6/15/2006	MBH Review KSK reply brief.	0.40 200.00/hr	80.00
6/19/2006	MBH Attend hearing on KSK motion to dismiss.	0.50 200.00/hr	100.00
6/20/2006	MBH Review order granting KSK motion to dismiss; research regarding effects of outright dismissal of complaint on claims against original defendants and statute of	1.80 200.00/hr	360.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	limitations problems.		
6/21/2006	MBH Review corrections to order dismissing KSK and Kim Ki Sung.	0.20 200.00/hr	40.00
6/28/2006	MBH Work on Proposed Findings of Uncontroverted Fact for motions.	4.70 200.00/hr	940.00
6/29/2006	MBH Continue work on proposed findings of uncontroverted fact.	3.70 200.00/hr	740.00
6/30/2006	MBH Draft motion to modify case management schedule.	0.70 200.00/hr	140.00
7/10/2006	MBH Continue working on proposed findings of uncontroverted fact.	3.10 200.00/hr	620.00
7/11/2006	MBH Continue work on proposed findings of uncontroverted fact.	3.70 200.00/hr	740.00
7/13/2006	MBH Continue work on Proposed Findings of Uncontroverted Fact; begin drafting Motion for Summary Judgment; research regarding various issues in same.	7.70 200.00/hr	1,540.00
7/14/2006	MBH Complete findings of uncontroverted fact; finish review and revise summary judgment motion and memorandum including table of contents and table of authorities; supplemental research; e-file documents including assisting staff with exhibit and other attachment filings.	10.30 200.00/hr	2,060.00
7/15/2006	MBH Prepare errata and correct table of authorities; draft motion for default judgment; draft application for extension of time and proposed order; prepare all documents for filing and e-file; communications with staff regarding service on Park and Kim.	4.20 200.00/hr	840.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
8/9/2006	MBH Prepare for upcoming hearing on motions for summary judgment and default.	0.50 200.00/hr	100.00
8/10/2006	MBH Attend hearing on Motions for Summary Judgment and for Default Judgment (.5); meeting with clients to discuss the outcome of the hearing and continuing efforts to collect judgments (.7); call with Court regarding scheduled pretrial conference (.2); begin drafting summary judgment order (.2).	1.60 200.00/hr	320.00
8/11/2006	MBH Research regarding findings and conclusions with regard to orders granting summary judgment (.8); continue drafting and several revisions of order granting motion for summary judgment; draft proposed judgment and begin working on final compilation of cost (3.1).	3.90 200.00/hr	780.00
For professional services rendered		191.80	\$37,099.00

Additional Charges :

		<u>Qty/Price</u>	
6/23/2005	Court filing	1	250.00
	Filing Fee: FLSA Complaint.	250.00	
6/27/2005	Service of process fees	1	40.00
	Service of process fees.	40.00	
7/12/2005	Copying	157	39.25
	Office copies through July 11, 2005.	0.25	
	Mileage expense	16.3	6.52
	Mileage expense through July 8, 2005.	0.40	
8/15/2005	Copying	124	31.00
	Office copies through August 15, 2005.	0.25	

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	<u>Qty/Price</u>	<u>Amount</u>
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8/15/2005 Mileage expense	17.4	6.96
Mileage expenses through August 15, 2005.	0.40	
9/14/2005 Copying	15	3.75
Office copies through September 2005.	0.25	
9/15/2005 Facsimile	3	0.75
Office facsimile charges through September, 2005.	0.25	
Mileage expense	14.3	5.72
Mileage expense through September, 2005.	0.40	
9/27/2005 Court copies	63	31.50
Copying cost of filed documents of Asia Ent., Jung Jin Corp., Park Hwa Sun and Kim Hang Kwon from Court and Recorder's Office.	0.50	
10/31/2005 Mileage expense	18.1	7.24
Mileage charges for September through October 2005.	0.40	
Copying	252	63.00
Office copies through October 2005.	0.25	
Translation services	10	300.00
Translator fee for office conference from May through August, 2005.	30.00	
11/30/2005 Mileage expense	8.9	3.56
Mileage expense through November 2005.	0.40	
Copying	126	31.50
Office copies through November 2005.	0.25	
12/15/2005 Commercial Copies	1	190.93
Copying services of employment documents at Pacific Quick Print.	190.93	

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	<u>Qty/Price</u>	<u>Amount</u>
1/19/2006 Copying	39	9.75
Office copies through January 19, 2006.	0.25	
Mileage expense	32.1	12.84
Mileage expense through January 19, 2006.	0.40	
1/24/2006 Translation services	3.1	155.00
Translation rendered for Kim Hang Kwon deposition.	50.00	
1/25/2006 Translation services	2.5	125.00
Translation rendered for Kim Hang Kwon deposition.	50.00	
2/2/2006 Service of process fees	1	25.00
Service of process fees for Pil Sun Kim Kitami.	25.00	
2/10/2006 Service of process fees	1	25.00
Service of process fees for Cindy Seung-Hee.	25.00	
2/12/2006 Deposition fees	3	135.00
Deposition fees plus mileage for Pil Sun Kim Kitami, Cindy Yu Seung Hee and Kim Sung Eun.	45.00	
2/15/2006 Copying	71	17.75
Office copies through February 15, 2006.	0.25	
Facsimile	62	15.50
Office facsimile charges through February 15, 2006.	0.25	
Mileage expense	13.6	5.44
Mileage expense through February 15, 2006.	0.40	
Online research	3.24	259.20
On-line research expenses through February 15, 2006.	80.00	
2/21/2006 Translation services	2	100.00
Translator for Pil Sun Kitami.	50.00	

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	<u>Qty/Price</u>	<u>Amount</u>
3/7/2006 Translation services Translator for Kim Sung Ki deposition.	1 50.00	50.00
3/9/2006 Translation services Translator for Kim Ki Sung deposition.	3 50.00	150.00
3/15/2006 Facsimile Office facsimile charges through March 15, 2006.	4 0.25	1.00
Copying Office copies through March 15, 2006.	188 0.25	47.00
3/22/2006 Deposition transcripts Transcription fees for Jung Jin Corp.; Kim Ki Sung; Kim Pil Sun Kitami and Asia Ent., Inc. depositions.	1 1,132.00	1,132.00
3/31/2006 Postage Mail notice of transcript deposition completion to Mr. Kim Ki Sung, Mr. Kim Hang Kwon and Ms. Park Hwa Sun.	1 1.17	1.17
Online research On-line research expenses through March 31, 2006.	1.57 80.00	125.60
4/10/2006 Deposition transcripts Transcription fees for Cindy Yu deposition.	1 174.00	174.00
4/22/2006 Postage Postage fee for mailing documents via certified mail.	2 8.45	16.90
4/29/2006 Other expenses Internet access.	1 3.95	3.95
5/13/2006 Postage Postage fee for mailing documents via certificate of mailing.	2 1.58	3.16

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	<u>Qty/Price</u>	<u>Amount</u>
5/18/2006 Postage	2	5.12
Postage fee for mailing documents via certified mail to Mr. Kim Hang Kwon and Ms. Park Hwa Sun.	2.56	
5/19/2006 Copying	1198	299.50
Office copies through May 19, 2006.	0.25	
Facsimile	1	0.25
Office facsimile charges through May 19, 2006.	0.25	
Mileage expense	26	10.40
Mileage expense through May 19, 2006.	0.40	
Service of process fees	2	50.00
Service of process fee for serving Mr. Kim Ki Sung and KSK Corporation.	25.00	
5/24/2006 Facsimile	19	4.75
Office facsimile charges through May 24, 2006.	0.25	
6/9/2006 Postage	1	4.12
Mail via certificate mailing (Opposition to Motion) to Ms. Park & Mr. Kim Hang Kwon.	4.12	
6/20/2006 Online research	1.3	104.00
On-line research expenses through June 20, 2006.	80.00	
6/30/2006 CM-ECF-PACER Web Page Transcation	5	0.40
PACER-Web page net charges from 4/1/06 to 6/30/06.	0.08	
7/1/2006 Postage	1	3.16
Mail filed documents to Mr. Kim & Mrs. Park.	3.16	
7/7/2006 Mileage expense	26.2	10.48
Mileage expense through July 5, 2006.	0.40	

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	<u>Qty/Price</u>	<u>Amount</u>
7/14/2006 Copying	881	220.25
Copying and scanning documents for e-filing.	0.25	
7/15/2006 Postage	2	13.30
Mail transcript, motions and other court filed documents to Mrs. Park & Mr. Kim.	6.65	
Copying	1427	356.75
Office copies through July 15, 2006.	0.25	
8/10/2006 Translation services	19	570.00
Translation fee for office conferences and court hearing from September 2005 through August 2006.	30.00	
8/11/2006 Online research	1.23	98.40
On-line research expenses August 11, 2006.	80.00	
8/15/2006 Copying	8	2.00
Office copies through August 15, 2006.	0.25	
Mileage expense	9.5	3.80
Mileage expense through August 15, 2006.	0.40	
Total costs		<u>\$5,358.62</u>
Total amount of this bill		<u>\$42,457.62</u>
Balance due		<u><u>\$42,457.62</u></u>